

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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PETER OPPENEER  
CLERK US DIST COURT  
WD OF WI

EDDIE BAKER Jr.,  
Plaintiff,

Civil Action No.

v.

Product Liability Suit

COLGATE-PALMOLIVE COMPANY,  
Defendant.

14 C 725

COMPLAINT OF INJURY FOR COMPENSATORY AND PUNITIVE RELIEF

JURISDICTION

1. Jurisdiction of this Court is invoked pursuant to: 28 U.S.C. §1491 and any other statute the Court deems appropriate.

PARTIES

2. Eddie Baker Jr. is a federal prisoner with a registered number and address of #06233-089, OXFORD Federal Correctional Institution, P.O. Box 1000, Oxford, Wisconsin 53952-1000.
3. Defendant Colgate-Palmolive Company is a (as far as I know) personal hygiene company that in particular sells toothbrushes and tooth paste. Their known address to me is 300 Park Avenue, New York, NY 10022.

FACTS

4. Eddie Baker Jr. (Mr. Baker) on August 13, 2014, purchased a toothbrush from the prison commissary; a product made, sold, and distributed by the Colgate-Palmolive Company (C-PC).
5. After a few days use of the purchased toothbrush, a raspy

feeling came upon the inside of my jaws, where eventually a design of sharp lines on the back of the toothbrush abraded the skin enough to cause bleeding.

6. After getting over the shock of what had happened, for my physical and mental injuries, I sought a compensatory settlement with C-PC, see Exhibits A and B.
7. Mr. Baker will produce the toothbrush with the exceptionally sharp lines on it at trial or upon the Court's order for inspection.

RELIEF REQUESTED

Wherefore, plaintiff Eddie Baker Jr., seeks a judgment as follows:

1. Trial by jury on all issues triable by jury;
2. Compensatory damages in an amount to be determined by a jury;
3. Punitive damages in an amount to be determined by a jury;
4. Leave to amend if discovery after completion finds other pertinent factors, Federal Rule of Civil Procedure 15(a);
5. Plaintiff's cost of this suit;
6. That plaintiff be allowed to present evidence of the defendant's (the company's proxies) criminal wrongdoing if discovered in discovery to a federal grand jury. Federal Rule of Criminal Procedure 6(a); and
7. Such other relief as this Court deems just, proper,

and equitable.

Respectfully submitted,

October 17, 2014

Eddie Baker  
EDDIE BAKER Jr.

#06233-089

OXFORD FCI

P.O. Box 1000

Oxford, WI 53952

CERTIFICATE OF SERVICE

I, Eddie Baker Jr., being aware of a penalty for perjury, do declare that, on October 17, 2014, I placed in the OXFORD FCI mailing system a product liability suit captioned "Eddie Baker Jr. v. Colgate-Palmolive Company with first-class postage thereon, going to Clerk of Court, U.S. District Court for the Western District of Wisconsin, 120 N. Henry St., Rm. 320, Madison, WI 53703; and a copy to Colgate-Palmolive Company, 300 Park Ave., New York, NY 10022.

Eddie Baker  
EDDIE BAKER Jr.